IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. 13-00236 ono ER / help of
CAROLINA DEL CARMEN SERRANO,	No. 13-00236 Short fulach of Center tulach of Spouther, this Center to lack of Center
Defendant,	history is almost
MOTION TO MODIFY CO	ONDITIONS OF RELEASE

The Defendant, Carolina Serrano, by and through counsel, respectfully requests this Court to modify her Conditions of Release, and in support thereof, states as follows:

- 1. On or about October 29, 2013, this Court issued a Release Order and

 Conditions of Release, which set forth a requirement that "Defendant shall be
 on cellular electronic monitoring on a schedule to be determined by Pretrial

 Services..."
- 2. Defendant has performed well on Pretrial release and has complied with all conditions of her release.
- 3. Defendant submitted a Plea Agreement before this Court on March 28, 2014.
- 4. Defendant is now requesting that the condition of her release which requires cellular electronic monitoring be removed as a condition of her release.
- Counsel for the Defendant has spoken with both Pretrial Officer Maria K.
 Johnson and AUSA Trey Hilliard, and both have confirmed that they have no